UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

GREGORY J. LAUREANNO,
Plaintiff

v.

DEATON, INC. and THEODORE WILLIAM BACALIS, Defendants 2804 (18) 13 P 12: 7.3

- 4 / 18 / 18 / 18 COURT
MASS

CIVIL ACTION NO. 04 11592 RCL

ASSENTED-TO MOTION FOR AN EXTENSION OF TIME TO RESPOND TO THE PLAINTIFF'S COMPLAINT

Defendants, Deaton, Inc. and Theodore William Bacalis, respectfully move for an extension of time within which to respond to the plaintiff's Complaint. Specifically, defendants seek an additional 21 days – until September 3, 2004 – to file their responsive pleading. As grounds for this motion, defendants state that they require additional time to respond in order to review relevant information. Plaintiff has assented to defendants' request for an extension.

WHEREFORE, defendants request this Court to allow their motion to extend and to permit them to file their answer to the plaintiff's Complaint on or before September 3, 2004.

Defendants, Deaton, Inc. and Theodore W. Bacalis,

By their attorneys,

Michele E. O'Brien, BBO No. 648182 Sugarman, Rogers, Barshak & Cohen, P.C.

101 Merrimac Street, 9th Floor

Boston, MA 02114 Tel. (617) 227-3030

ASSENTED TO:

W. E. McKeon / MO'B William E. McKeon, Jr., BBO No. 336510

Ten North Main Street Fall River, MA 02720 Tel. (508) 677-4424

Dated: August 12, 2004

CERTIFICATE OF SERVICE

I, Michele E. O'Brien, hereby certify that on August 12, 2004, I served the Assented-To Motion of Defendants Deaton, Inc. and Theodore William Bacalis for an Extension of Time to Respond to the Plaintiff's Complaint by mailing a copy of same, postage prepaid, to the following:

William E. McKeon, Jr., Esq. Ten North Main Street Fall River, MA 02720

Michele E. O'Brier

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